

Pro Se 7 (Rev. 12/16) Complaint for Employment Discrimination

UNITED STATES DISTRICT COURT

United States Courts
Southern District of Texas
FILED

for the

Southern District of Texas

DEC 20 2024

Houston Division

Nathan Ochser, Clerk of Court

Bryce Brown

Case No. _____

(to be filled in by the Clerk's Office)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

G&A OUTSOURCING III LLC DBA
ONPOINT LAB, ET AL
CHANDRESH PATEL

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

COMPLAINT FOR EMPLOYMENT DISCRIMINATION

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

~~Bryce Brown~~
BRYCE BROWN

Street Address

935 N. Wilcrest Dr. Apt. 1018

City and County

Houston Harris County

State and Zip Code

Texas 77079

Telephone Number

281 763-8151

E-mail Address

Brycebrown19@gmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Pro Se 7 (Rev. 12/16) Complaint for Employment Discrimination

Defendant No. 1

Name
Job or Title *(if known)*
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address *(if known)*

Chandresh Patel
Owner and Share Holder
145 Promenade Way Suite 2
Sugarland Fort Bend County
Texas 77479
(832) 939-8480

Defendant No. 2

Name
Job or Title *(if known)*
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address *(if known)*

G&A OUTSOURCING III LLC DBA ONPOINT LAB
Company
145 Pomenade Way Suite 2
Sugarland Fort Bend County
Texas 77479
(832) 939-8480

Defendant No. 3

Name
Job or Title *(if known)*
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address *(if known)*

Defendant No. 4

Name
Job or Title *(if known)*
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address *(if known)*

Pro Se 7 (Rev. 12/16) Complaint for Employment Discrimination

C. Place of Employment

The address at which I sought employment or was employed by the defendant(s) is

Name	G&A OUTSOURCING III LLC DBA ONPOINT LAB
Street Address	145 Promenade Way Suite 2
City and County	Sugarland Fort Bend County
State and Zip Code	Texas 77479
Telephone Number	(832) 939-8480

II. Basis for JurisdictionThis action is brought for discrimination in employment pursuant to *(check all that apply)*:

Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e to 2000e-17 (race, color, gender, religion, national origin).

(Note: In order to bring suit in federal district court under Title VII, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)

Age Discrimination in Employment Act of 1967, as codified, 29 U.S.C. §§ 621 to 634.

(Note: In order to bring suit in federal district court under the Age Discrimination in Employment Act, you must first file a charge with the Equal Employment Opportunity Commission.)

Americans with Disabilities Act of 1990, as codified, 42 U.S.C. §§ 12112 to 12117.

(Note: In order to bring suit in federal district court under the Americans with Disabilities Act, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)Other federal law *(specify the federal law)*:Relevant state law *(specify, if known)*:Relevant city or county law *(specify, if known)*:

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. The discriminatory conduct of which I complain in this action includes *(check all that apply)*:

- ☐ Failure to hire me.
☒ Termination of my employment.
☐ Failure to promote me.
☐ Failure to accommodate my disability.
☒ Unequal terms and conditions of my employment.
☒ Retaliation.
☐ Other acts *(specify)*: _____

(Note: Only those grounds raised in the charge filed with the Equal Employment Opportunity Commission can be considered by the federal district court under the federal employment discrimination statutes.)

B. It is my best recollection that the alleged discriminatory acts occurred on date(s)
 8/29/23, 9/5/23, 9/13/23, 10/10/23, 11/7/23, 12/15/23

C. I believe that defendant(s) *(check one)*:

- ☐ is/are still committing these acts against me.
☒ is/are not still committing these acts against me.

D. Defendant(s) discriminated against me based on my *(check all that apply and explain)*:

- ☒ race _____
☒ color _____
☒ gender/sex _____
☐ religion _____
☐ national origin _____
☐ age *(year of birth)* _____ *(only when asserting a claim of age discrimination.)*
☐ disability or perceived disability *(specify disability)* _____

E. The facts of my case are as follows. Attach additional pages if needed.

Pro Se 7 (Rev. 12/16) Complaint for Employment Discrimination

My name is Bryce Brown. I am more than eighteen (18) years of age and fully competent to testify to the facts set forth in this Declaration. I have personal knowledge of the facts stated herein and these facts are true and correct. This Declaration is given voluntarily. I have not been promised any benefit, coerced, or threatened in any manner in exchange for this testimony in this Declaration. I am a former prospective employee at G&A OUTSOURCING III LLC DBA ONPOINT LAB. In August 2023, I was hired by G&A OUTSOURCING III LLC DBA ONPOINT LAB. I have personal knowledge of the matters stated herein, and the facts contained in this Declaration are true and correct.
SEE EXHIBIT "A"

(Note: As additional support for the facts of your claim, you may attach to this complaint a copy of your charge filed with the Equal Employment Opportunity Commission, or the charge filed with the relevant state or city human rights division.)

IV. Exhaustion of Federal Administrative Remedies

- A. It is my best recollection that I filed a charge with the Equal Employment Opportunity Commission or my Equal Employment Opportunity counselor regarding the defendant's alleged discriminatory conduct on *(date)*

October 4, 2024

- B. The Equal Employment Opportunity Commission *(check one)*:

☐

has not issued a Notice of Right to Sue letter.

☒

issued a Notice of Right to Sue letter, which I received on *(date)* 10/04/2024

(Note: Attach a copy of the Notice of Right to Sue letter from the Equal Employment Opportunity Commission to this complaint.)

- C. Only litigants alleging age discrimination must answer this question.

Since filing my charge of age discrimination with the Equal Employment Opportunity Commission regarding the defendant's alleged discriminatory conduct *(check one)*:

☐

60 days or more have elapsed.

☐

less than 60 days have elapsed.

V. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Pro Se 7 (Rev. 12/16) Complaint for Employment Discrimination

A. Back pay, lost wages, benefits paid from date of discrimination until trial date; B. Front pay including future bonuses, lost earnings & benefits; C. Judgment against Defendant amount equal to Plaintiff's unpaid back wages at the applicable overtime rate for each hour worked over forty; D. Judgment against Defendant their violations of FLSA were willful; E. Equal amount to wage damages as liquidated damages; F. The extent that liquidated damages are not awarded, an award of prejudgment interest; G. Damages for mental pain & suffering; H. All costs incurred & reasonable attorneys' fees for prosecuting claims; I. Punitive damages; J. Injunctive relief; K. Leave to add additional Plaintiffs by motion, the filing of written consent forms, or any other method approved by the Court entitled. L. All other and further relief to which Plaintiff may show herself justly.

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 12/20/2024

Signature of Plaintiff

Printed Name of Plaintiff Bryce Brown

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

BRYCE BROWN

Plaintiff

v.

G&A OUTSOURCING III LLC
DBA ONPOINT LAB

§
§
§
§
§
§
§

CIVIL ACTION NO.

§

DECLARATION OF BRYCE BROWN

DECLARATION OF BRYCE BROWN PURSUANT TO 28 U.S.C. § 1746 UNDER
THE PENALTY OF PERJURY

My name is Bryce Brown. I am more than eighteen (18) years of age and fully competent to testify to the facts set forth in this Declaration. I have personal knowledge of the facts stated herein and these facts are true and correct. This Declaration is given voluntarily. I have not been promised any benefit, coerced, or threatened in any manner in exchange for this testimony in this Declaration.

1. I am a former prospective employee at G&A OUTSOURCING III LLC DBA ONPOINT LAB. In August 2023, I was hired by G&A OUTSOURCING III LLC DBA ONPOINT LAB. I have personal knowledge of the matters stated herein, and the facts contained in this Declaration are true and correct.

2. During my employment with G&A OUTSOURCING III LLC DBA ONPOINT LAB, I was not treated as former reps prior to me had been treated. I was subjected to using old

or out of date marking materials. With the inadequate address to OnPoint Lab. Please see Exhibit A (A-1) I had no business cards nothing up to date to make me successful in my job duties. I had reached out several times to Mr. Chandresh Patel and his assistant Yorleni Moran about the marketing materials. She could not order anything without his approval. I also reached out to Mr. Chandresh Patel and our Human Resource Development Carla Acosta about the issue of not having the proper materials via text message. Attached to my declaration as Exhibit B (B-1 to B-4) text message threats between myself, Bryce Brown and Mr. Patel's assistant Yorleni Moran and Carla Acosta head of Human Resources and Chandresh Patel.

3. On September 25, 2023, I sat down to lunch with Chandresh Patel at Mia's Table at 18450 1-45 S, Shenandoah, Tx. We had just come from a meeting with Dr. Bishai in the Woodlands Conroe area. Mr. Patel informed me that he did not care for sandwiches which I have purchased at Schlotzsky's Deli. Chandresh Patel informed me while eating at Mia's Table, his girlfriend owned a Quiznos Deli out in the Sugarland area. Mr. Patel went on to say that he and his girlfriend would be having dinner that evening and asked if I and my husband would like join for dinner.

4. Following that statement, I began to wrap up my lunch and informed Mr. Patel I had a few more offices to see, and I'd see him at work the following day. I inquired about new marketing material business cards, name, tag, etc. so that while going into the offices, they would know what we had to offer and none of the things that I had requested and were promised to me in the interview were at my fingertips.

5. On December 15, 2023, I noticed been moved from salary to hourly I approached Mr. Patel and asked why I had not been informed via email, via text message, via letter and Mr. Patel informed me if I (Bryce Brown) did not like being considered hourly that I could go

elsewhere. Being in meetings with Mr. Patel was quite challenging. He is not one to hear other's opinion even if it could help the company. In the last meeting with Mr. Patel, I managed to record a snit bit of how rude and irate he always was in a meeting.

6. Throughout my time at GNA outsourcing the third LLC and OnpointLab working for Mr. Patel I was subjected to racial discrimination by not supplying me with the adequate tools as he did for the reps that are not African-American descent that came prior before me, I was treated differently because he felt as if I had a husband. I was treated differently and forced to choose my job or choose unemployment if I did not like being moved from salary to hourly.

7. On December 22, 2023 without warning of any corrective actions being taken. Mr. Chandresh Patel ended Mr. Brown's employment. Mr. Brown filed for unemployment, and it was awarded. Mr. Patel decided to challenge the outcome. and appeal the state of Texas decision. The State of Texas gave a list of questions for Mr. Patel to answer see Exhibit C (C-1) In a statement that Mr. Patel gave to the Texas Unemployment appeal committee see Exhibit C (C-2) was that he was unhappy and unsatisfied with Mr. Brown's performance.

Mr. Brown replied to all the claims Mr. Patel had brought forth see Exhibit C (C-3) Mr. Patel never gave Mr. Brown a written warning, a verbal warning, and when Mr. Brown asked, "Mr. Patel was there anything that he needed to do more?" Mr. Patel stated to Mr. Brown, "You are doing great", so at the time of the separation right before the employee Christmas party Mr. Brown was blindsided and embarrassed as Mr. Patel belittled and berated Mr. Brown as Mr. Brown was leaving the office. Mr. Chandresh Patel decided to drop his suit the day of the appealing hearing after Mr. Brown's proof of documents of not having adequate marketing materials in text messages.

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED on this 20th day of December, 2024.



A handwritten signature in black ink, consisting of stylized, overlapping letters that appear to be 'B' and 'B', followed by a horizontal line extending to the right.

Bryce Brown



U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

Houston District Office
1919 Smith Street, 6th Floor
Houston, TX 77002
(346) 327-7700
Website: www.eeoc.gov

DETERMINATION AND NOTICE OF RIGHTS

(This Notice replaces EEOC FORMS 161, 161-A & 161-B)

Issued On: 10/04/2024

To: Mr. Bryce Brown
935 N. Wilcrest Dr 1018 Apt 1018
HOUSTON, TX 77079

Charge No: 460-2024-04187

EEOC Representative and email: GERARD LADERA
EO Investigator
gerard.ladera@eeoc.gov

DETERMINATION OF CHARGE

The EEOC issues the following determination: The EEOC will not proceed further with its investigation and makes no determination about whether further investigation would establish violations of the statute. This does not mean the claims have no merit. This determination does not certify that the respondent is in compliance with the statutes. The EEOC makes no finding as to the merits of any other issues that might be construed as having been raised by this charge.

NOTICE OF YOUR RIGHT TO SUE

This is official notice from the EEOC of the dismissal of your charge and of your right to sue. If you choose to file a lawsuit against the respondent(s) on this charge under federal law in federal or state court, **your lawsuit must be filed WITHIN 90 DAYS of your receipt of this notice.** Receipt generally occurs on the date that you (or your representative) view this document. You should keep a record of the date you received this notice. Your right to sue based on this charge will be lost if you do not file a lawsuit in court within 90 days. (The time limit for filing a lawsuit based on a claim under state law may be different.)

If you file a lawsuit based on this charge, please sign in to the EEOC Public Portal and upload the court complaint to charge 460-2024-04187.

On behalf of the Commission,

Digitally Signed By: Rayford O. Irvin
10/04/2024

Rayford O. Irvin
District Director

Cc:

Chandresh Patel

G&A OUTSOURCING III LLC DBA ONPOINT LAB

145 Promenade Way Ste. 2

SUGAR LAND, TX 77479

Please retain this notice for your records.

EEOC Form 5 (07/24)

CHARGE OF DISCRIMINATION

This form is affected by the Privacy Act of 1974.

See attached Privacy Act Statement and other information before completing this form.

CHARGE PRESENTED TO:

AGENCY CHARGE NO.

EEOC

460-2024-04187

Texas Workforce Commission Civil Rights Division

Name (indicate Mr., Ms., Mrs., Miss, Mx., Dr., Hon., Rev.): Mr. Bryce Brown

Home Phone: (281) 763-8151

Year of Birth: 1986

Street Address: 935 N. Wilcrest Dr Apt 1018

HOUSTON, TX 77079

Named below is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency that I believe discriminated against me or others.

Name: G&A Outsourcing III LLC dba OnPoint Lab

No. Employees, Members: 15 - 100 Employees

Phone No.:

Street Address: 145 Promenade Way Ste. 2

SUGAR LAND, TX 77479

Name:

No. Employees, Members:

Phone No.:

Street Address:

DISCRIMINATION BASED ON:

Color, Retaliation, Sex

DATE(S) DISCRIMINATION TOOK PLACE

Earliest: 09/17/2023

Latest: 12/18/2023

THE PARTICULARS ARE:

On December 18, 2023, I was discharged from my position as a Marketing Representative by the owner, Chandresh Patel, allegedly for poor performance, which I believe to be pretext to discrimination and retaliation.

I applied on Indeed for the position which offered \$80k - \$85k. However, when Mr. Patel hired me on September 17, 2023, he would only offer \$55k. I was the only African American male that worked at this location in Sugar Land, Texas. I have evidence that shows that throughout my employment, I had been requesting Mr. Patel for updated marketing materials, a business card with my name on it, and a name tag, to properly fulfill my role within the company. Patel refused to provide any of the requested items. During a business lunch, Patel questioned my sexuality by asking if I and my husband would be joining him and his fianc along with some of their friends for dinner that evening. I feel that I was mistreated because of the color of my skin, my sexual orientation, and for constantly bringing to Patel's attention that I needed updated marketing materials. At a meeting shortly before our office Christmas party began, I asked Mr. Patel why my status had changed from salary to hourly. He replied that if I didn't like it, I was free to go. Mr. Patel became enraged and made verbally abusive comments and used statements like, "your kind" never gets the job done, which I have recorded. He then told me to grab my briefcase, leave the company laptop, and to immediately leave the premises. All this transpired within earshot of coworkers gathered around Mr. Patel's office for the Christmas party.

EEOC Form 5 (07/24)

I believe that I was retaliated against for engaging in protected activity and discriminated against based on my skin color, race (Black), and sex (male), in violation of Title VII of the Civil Rights Act of 1964, as amended.

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

I declare under penalty of perjury that the above is true and correct.

Digitally Signed By: Mr. Bryce Brown

10/03/2024

Charging Party Signature & Date

NOTARY – When necessary for State and Local Agency Requirements

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information, and belief.

Signature of Complainant

Subscribed and sworn to before me this date:

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

BRYCE BROWN

Plaintiff

v.

G&A OUTSOURCING III LLC
DBA ONPOINT LAB

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§
§

CIVIL ACTION NO.

§

DECLARATION OF BRYCE BROWN

**DECLARATION OF BRYCE BROWN PURSUANT TO 28 U.S.C. § 1746 UNDER
THE PENALTY OF PERJURY**

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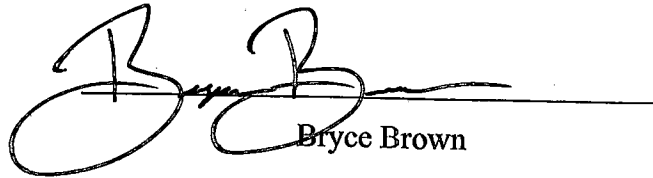
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I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED on this 20th day of December, 2024.



Bryce Brown

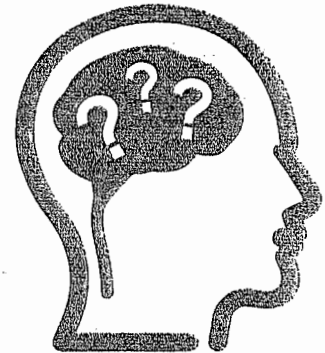
EXHIBIT A

OnPoint

PAD Panel

The Parkinson's, Alzheimer's and dementia panel screens genes associated with hereditary Parkinson's, Alzheimer's and dementia : APOE, APP, ATPI3A2, ATP1A3, C9orf72, CSF1R, DCTN1, DNMT1, EIF4G1, FBXO7, GBA, GCHI, GRN, HTRA2, LRRK2, MAPT, NOTCH3, PARK7, PINK1, PLA2G6, POLG, PRKN, PRKRA, PRNP, PSEN1, PSEN2, SLC6A3, SNCA, SNCB, TAF1, TH, TREM2, TYROBP, UCHL1, VPS35 (35 genes) The PAD panel is done through a buccal swab and results can be expected within 3-4 weeks.

- Parkinson's is the second most common neurodegenerative disease after Alzheimer's disease and has a prevalence of approximately 1% in people over the age of 60. Parkinson's disease typically consists of motor features such as tremor and muscle rigidity but can also include cognitive decline and dementia. Many cases of Parkinson's are probably caused by multiple factors, both genetic and environmental, however, 5-10% of patients have a monogenic form caused by mutations in a specific gene .
- Alzheimer's is the most common type of dementia. Alzheimer's typically begins with subtle failure of memory that progresses over time until it becomes incapacitating. The disease is characterized by amyloid plaques and neurofibrillary tangles. Approximately 25% of all Alzheimer's is familial which can be distinguished from non-familial Alzheimer's by family history and molecular genetic testing. Three genes have been linked to early onset Alzheimer's disease accounting for a majority of cases: APP, PSEN1, PSEN2
- Dementia consists of cognitive and behavioral symptoms that interfere with usual activities and represent a decline from previous function. Many forms of dementia are thought to be multi-factorial and are genetically complex diseases; however, some have been shown to be due to distinct genetic causes . A clinical evaluation may not be sufficient to distinguish specific type of dementia, therefore a genetic test can be valuable in establishing clinical diagnosis.



1. The global prevalence of dementia: A systematic review and metaanalysis. Prince M, Bryce RA, Albanese E, Wimo A, Ribeiro W, Ferri CP. 63-75.e2, s.l. : Alzheimers Dement, 2013, Vol. Jan;9(1). doi:10.1016/j.jalz.2012.11.007.
 2. The diagnosis of dementia due to Alzheimer's disease: Recommendations from the National Institute on Aging-Alzheimer's Association workgroups on diagnostic guidelines for Alzheimer's disease. McKhann GM1, Knopman DS, Chertkow H, Hyman BT, Jack CR Jr, Kawas CH, Klunk WE, Koroshetz WJ, Manly JJ, Mayeux R, Mohs RC, Morris JC, Rossor MN, Scheltens P, Carrillo MC, Thies B, Weintraub S, Phelps CH. 263-9, s.l. : Alzheimers Dement, 2011, Vol. May;7(3). doi: 10.1016/j.jalz.2011.03.005. 3. Genetics of dementia. Loy CT, Schofield PR, Turner AM, Kwok JB. 828-40, s.l. : Lancet, 2014, Vol. Mar;383(9919). doi: 10.1016/S0140-6736(13)60630-3. 4. Alzheimer Disease Overview. Bird TD, in: Adam MP, Ardinger HH, Pagon RA, et al., editors. Seattle (WA): University of Washington, Seattle : GeneReviews® [Internet]., 1998 Oct 23 [Updated 2018 Dec 20]. Vols. 1993-2020. available from: <https://www.ncbi.nlm.nih.gov/books/NBK1161/>. 5. Alzheimer's disease. Ballard C, Gauthier S, Corbett A, Brayne C, Aarsland D, Jones E. 1019-31, s.l. : Lancet, 2011, Vol. Mar 19;377(9770). doi: 10.1016/S0140-6736(10)61349-9. 6. Frontotemporal dementia. Bang J, Spina S, Miller BL. 1672-82, s.l. : Lancet, 2015, Vol. Oct 24;386(10004). doi: 10.1016/S0140-6736(15)00461-4. 7. The heritability and genetics of frontotemporal lobar degeneration. Rohrer JD1, Guerreiro R, Vandrovicova J, Uphill J, Reiman D, Beck J, Isaacs AM, Authier A, Ferrari R, Fox NC, Mackenzie IR, Warren JD, de Silva R, Holton J, Revesz T, Hardy J, Mead S, Rossor MN. 1451-6, s.l. : Neurology, 2009, Vol. Nov 3;73(18). doi: 10.1212/WNL.0b013e3181b1b997a. 8. The genetics of Parkinson disease. Deng H, Wang P, Jankovic J. 72-85, s.l. : Ageing Res Rev, 2018, Vol. Mar;42. doi: 10.1016/j.arr.2017.12.007. 9. Atlas-CNV: a validated approach to call single-exon CNVs in the eMERGESeq gene panel. Chiang T, Liu X, Wu TJ, Hu J, Sedlazeck FJ, White S, et al. 2135-2144, s.l. : Genet Med, 2019, Vol. 21(9)

EXHIBIT B

EXHIBIT B-1

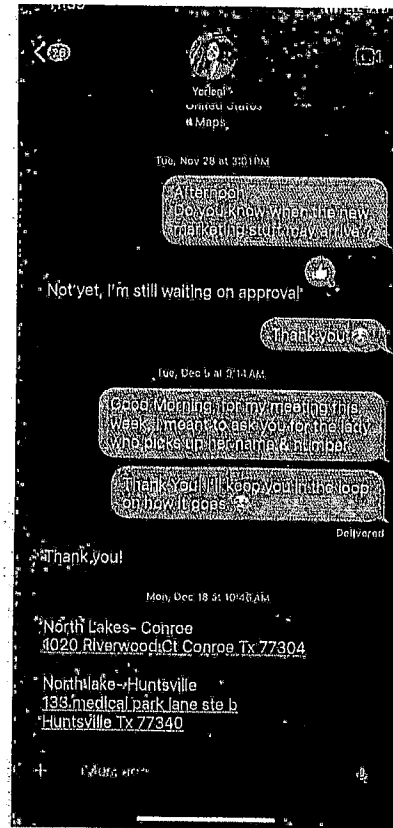


EXHIBIT B-2



EXHIBIT B-3

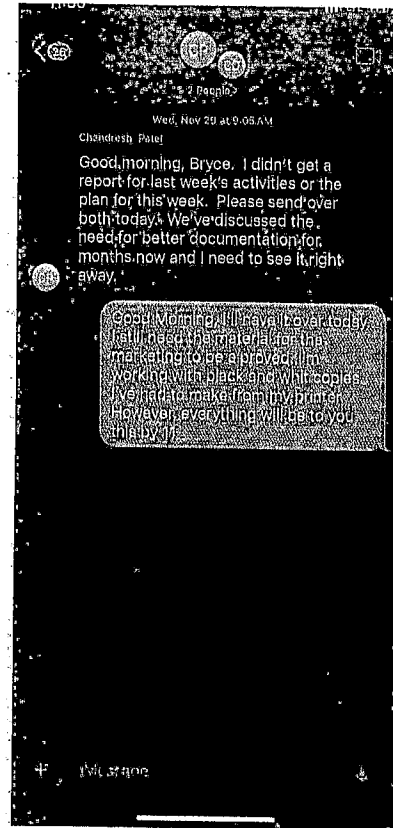


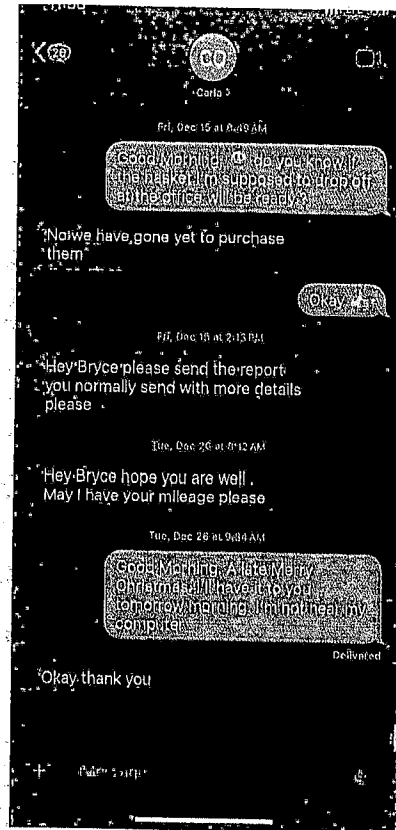
EXHIBIT B-4

EXHIBIT C



~~April 19, 2024~~

Fax To:
512-322-2875

Employer: G&A Outsourcing, LLC
Employer Account Number: 13-094505-8
Claimant's Name: BRYCESON BROWN
Claimant's SSN: XXX-XX-3006

To Whom It May Concern,

Was the claimant ever given written notice of written instructions advising him to report back to the PEO for further assignment? If no, was he even given any other types of instructions regarding reporting back? NO

Was the employer ever satisfied with the claimant's performance? If so, are they aware of any root cause that was leading to a decline in the claimant's performance? I was never satisfied with Bryce's performance. I gave him time to learn our tests and services but he failed to follow through on marketing the company and try to grow the business.

Did the claimant actually receive any verbal or written warnings regarding performance at any time? If so, if there is documentation please attach it. Bryce was counseled at every meeting to provide proper activity reports, sign in sheets, and other documentation other than a mileage log with just an address without clinic or doctor name.

The final incident was on 12/18/2023 and it was because he was not able to provide proper documentation of his time and interaction. Were there any previous warnings regarding providing proper documentation? If so, please provide date and details and/or please attach copies of the warnings. This was requested of him at every meeting. He said he would work on it but never provided adequate documentation. I felt like he had another job or personal business on the side. Carla Acosta and Yorleni Moran sat in all the meetings and can attest to the constant requests.

Sincerely,

Chance Sullins

Unemployment Claims Analyst
Direct Phone: 615-924-8604
Email: chance.sullins@hrlogics.com

Section 5 - General Standards of Conduct**5.1 Workplace Conduct**

Onpoint Lab endeavors to maintain a positive work environment. Each employee plays a role in fostering this environment. Accordingly, we all must abide by certain rules of conduct, based on honesty, common sense and fair play.

Because everyone may not have the same idea about proper workplace conduct, it is helpful to adopt and enforce rules all can follow. Unacceptable conduct may subject the offender to disciplinary action, up to and including discharge, in the Company's sole discretion. The following are examples of some, but not all, conduct which can be considered unacceptable:

1. Obtaining employment on the basis of false or misleading information.
2. Stealing, removing or defacing Onpoint Lab property, client or a co-worker's property, and/or disclosure of confidential information.
3. Completing another employee's time records.
4. Violation of safety rules and policies.
5. Violation of Onpoint Lab's Drug and Alcohol-Free Workplace Policy.
6. Fighting, threatening or disrupting the work of others or other violations of Onpoint Lab's Workplace Violence Policy.
7. Raising voice, non-professionalism or altercation at Company or client work site.
8. Multiple complaints from client regarding performance or behavior.
- ✓ 9. Failure to follow lawful instructions of a supervisor.
- ✓ 10. Failure to perform assigned job duties.
11. Violation of the Punctuality and Attendance Policy, including but not limited to irregular attendance, habitual lateness or unexcused absences.
12. Gambling on Company property.
13. Willful or careless destruction or damage to Company assets or to the equipment or possessions of another employee.
14. Wasting work materials.
15. Falsification of Company records.
16. Performing work of a personal nature during working time.
17. Violation of the Solicitation and Distribution Policy.
18. Violation of Onpoint Lab's Harassment or Equal Employment Opportunity Policies.
19. Violation of the Communication and Computer Systems Policy.
- ✓ 20. Unsatisfactory job performance.
21. Any other violation of Company policy.

Obviously, not every type of misconduct can be listed. Since the nature of our business requires our staff presence at clients' job site, it is important that employees follow the same code of conduct at clients' work site as Onpoint Lab. Repetitive complaints by the client(s) shall be investigated and if needed, corrective measures maybe taken up to and including termination. Note that all employees are employed at-will, and Onpoint Lab reserves the right to impose whatever discipline it chooses, or none at all, in a particular instance. The Company will deal with each situation individually and

MR. BROWN RESPONSE

Mr. Patel was asked a series of questions:

His response to the first question was No.

Mr. Patel responded to the second question with he was never satisfied with Mr. Brown's performance.

Response: (How could Mr. Brown perform without marking materials going back to Exhibit A-D)

Mr. Patel response to the third question was: Mr. Brown was counseled at every meeting.

Response: (Mr. Patel wanted sign in sheets and other documents. But, without proper materials exhibit (A, B, C, D,) how was Mr. Brown supposed to get the office to sign a sheet, when he had no marking material or outdated material. If you will go back and look at exhibit E3 to E8 you will see Mr. Brown gave names of whom he spoke with and locations.)

Mr. Patel responded to question four about the termination with Mr. Brown never provided information.

Response: (For reference exhibit E3 to E8 is just some of the documents Mr. Brown provide.)

Also, Mr. Patel says in his response to question four he felt Mr. Brown had another business adventure taking place at same time as his employment time with OnPoint Lab.

Response: (How can that be when Mr. Brown was at the office on days when not in the field.)

Mr. Patel makes mention that Mrs. Acosta & Mrs. Moran can attest to setting in meetings and the conversation that where had.

Response: (but never once was a write up given to Mr. Brown due to his alleged poor mis conduct or anything presented for him to sign stating what was said or discussed in these meetings or recorded for training purposes.)